

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Henry L. Fambrough

(b) County of Residence of First Listed Plaintiff Troy, Michigan
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Luther E. Weaver, III 215-790-0600 (also, see attachment)
Weaver & Associates, P.C.
1525 Locust St. 14th Fl, Phila., PA 19102

DEFENDANTS

Frank R. Washington

County of Residence of First Listed Defendant Philadelphia, PA
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input checked="" type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Latham Act 15 U.S.C. 1051, et seq.
Brief description of cause:
action for violation of Plaintiffs' trademark

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE 2-8-2019 SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

FEB -8 2019

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 2956Tewksbury Lane, Troy, Michigan 48098

Address of Defendant: 815 N. Preston Street, Philadelphia, PA 19104

Place of Accident, Incident or Transaction: Interstate Commerce

RELATED CASE, IF ANY:

Case Number: Judge: Date Terminated:

Civil cases are deemed related when Yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? Yes ☐ No ☒

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 02/08/2019

John E. Weaver, Esq.
Attorney-at-Law / Pro Se Plaintiff

17827

Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☐ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☒ 11. All other Federal Question Cases

(Please specify): Lanham Act

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify):
- ☐ 7. Products Liability
- ☐ 8. Products Liability – Asbestos
- ☐ 9. All other Diversity Cases

(Please specify):

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, Luther E. Weaver, III, counsel of record or pro se plaintiff, do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☒ Relief other than monetary damages is sought.

DATE: 02/08/2019

John E. Weaver, Esq.
Attorney-at-Law / Pro Se Plaintiff

17827

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 2956Tewksbury Lane, Troy, Michigan 48098

Address of Defendant: 815 N. Preston Street, Philadelphia, PA 19104

Place of Accident, Incident or Transaction: Interstate Commerce

RELATED CASE, IF ANY:

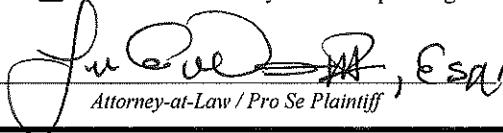
Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- | | | |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 02/08/2019


Attorney-at-Law / Pro Se Plaintiff

17827

Attorney I.D. # (if applicable)

CIVIL: (Place a √ in one category only)

A. Federal Question Cases:

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- ☐ 2. FEELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☐ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☒ 11. All other Federal Question Cases

(Please specify): Lanham Act

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): _____
- ☐ 7. Products Liability
- ☐ 8. Products Liability – Asbestos
- ☐ 9. All other Diversity Cases

(Please specify): _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, Luther E. Weaver, III, counsel of record or pro se plaintiff, do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☒ Relief other than monetary damages is sought.

DATE: 02/08/2019


Attorney-at-Law / Pro Se Plaintiff

17827

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

Additional Defendants

Henry L. Fambrough v. Frank R. Washington, et al.

Andrea Jackson
7715 Crittenden Street
Philadelphia, PA 19118

AMJ Entertainment, AMJ Management Group, AMJ Entertainment Events
7715 Crittenden St.
Philadelphia, PA 19118

John Does 1 through 10

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

HENRY L. FAMBROUGH

CIVIL ACTION

v.

FRANK R. WASHINGTON, et al

NO.

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568

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (✓)

Date	Luther E. Weaver, III, Esquire Attorney-at-law	Henry L. Fambrough Attorney for
(215) 790-0600	(215) 790-0628	lew@leweaver.com
Telephone	FAX Number	E-Mail Address

(Civ. 660) 10/02

FEB - 8 2019

**Civil Justice Expense and Delay Reduction Plan
Section 1:03 - Assignment to a Management Track**

- (a) The clerk of court will assign cases to tracks (a) through (d) based on the initial pleading.
- (b) In all cases not appropriate for assignment by the clerk of court to tracks (a) through (d), the plaintiff shall submit to the clerk of court and serve with the complaint on all defendants a case management track designation form specifying that the plaintiff believes the case requires Standard Management or Special Management. In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.
- (c) The court may, on its own initiative or upon the request of any party, change the track assignment of any case at any time.
- (d) Nothing in this Plan is intended to abrogate or limit a judicial officer's authority in any case pending before that judicial officer, to direct pretrial and trial proceedings that are more stringent than those of the Plan and that are designed to accomplish cost and delay reduction.
- (e) Nothing in this Plan is intended to supersede Local Civil Rules 40.1 and 72.1, or the procedure for random assignment of Habeas Corpus and Social Security cases referred to magistrate judges of the court.

**SPECIAL MANAGEMENT CASE ASSIGNMENTS
(See §1.02 (e) Management Track Definitions of the
Civil Justice Expense and Delay Reduction Plan)**

Special Management cases will usually include that class of cases commonly referred to as "complex litigation" as that term has been used in the Manuals for Complex Litigation. The first manual was prepared in 1969 and the Manual for Complex Litigation Second, MCL 2d was prepared in 1985. This term is intended to include cases that present unusual problems and require extraordinary treatment. See §0.1 of the first manual. Cases may require special or intense management by the court due to one or more of the following factors: (1) large number of parties; (2) large number of claims or defenses; (3) complex factual issues; (4) large volume of evidence; (5) problems locating or preserving evidence; (6) extensive discovery; (7) exceptionally long time needed to prepare for disposition; (8) decision needed within an exceptionally short time; and (9) need to decide preliminary issues before final disposition. It may include two or more related cases. Complex litigation typically includes such cases as antitrust cases; cases involving a large number of parties or an unincorporated association of large membership; cases involving requests for injunctive relief affecting the operation of large business entities; patent cases; copyright and trademark cases; common disaster cases such as those arising from aircraft crashes or marine disasters; actions brought by individual stockholders; stockholder's derivative and stockholder's representative actions; class actions or potential class actions; and other civil (and criminal) cases involving unusual multiplicity or complexity of factual issues. See §0.22 of the first Manual for Complex Litigation and Manual for Complex Litigation Second, Chapter 33.

Additional Attorney of Record to be Listed:

Paul Mathis, Jr., Esq.¹

Paul Mathis, LLC
716 Tampa Dr.
Greenville, MS 38701

Mailing:
P.O. Box 936
Greenville, MS 38702-0926

Licensed and Admitted:

Michigan Bar. No. P-24761
Mississippi Bar. No. 8993

PACER Account: 2691334

Email:
paulmathis@bellsouth.net

^{1 1} Application Pro Hac Vice , Pending

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\$400

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**SPINNERS PERFORMING ARTS, LLC, D/B/A "THE SPINNERS" AND
HENRY L. FAMBROUGH**

PLAINTIFFS

VS

CIVIL ACTION NO. 19 568

**FRANK WASHINGTON, INDIVIDUALLY, HIS AGENTS
AND JOHN DOES 1-10, ACTING IN CONCERT WITH HIM;
ANDREA JACKSON, INDIVIDUALLY; AMJ ENTERTAINMENT GROUP, AMJ
MANAGEMENT, and AMJ ENTERTAINMENT EVENTS**

DEFENDANTS

VERIFIED COMPLAINT

COMES NOW the Plaintiffs, Spinners Performing Arts, LLC, d/b/a "The Spinners" and Henry L. Fambrough and ("Plaintiffs"), versus the Defendant Frank Washington, individually, his agents and John Does 1-10, acting in concert with him, Andrea Jackson, Individually, AMJ Entertainment Group, AMJ Management and AMK Entertainment Events , complain and allege, as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter and the party Defendants known, those acting in concert with them and those unknown.
2. Venue in this Court, County and State is proper, because, Defendant, Frank Washington, is a resident of the State of Pennsylvania and a substantial part of the events and omissions giving rise to the claims herein occurred in this State and the Defendant is subject to personal jurisdiction at the time this action is commenced.
3. The within action is, in part, brought under, *inter alia*, the Lanham Act, 15 U.S.C. §§ 1051, *et seq.*, as the conduct complained of herein is active and ongoing in interstate commerce.

FEB 08 2019

4. Plaintiffs further allege violation of Pennsylvania common law and statutory rights under the Pennsylvania Trademark Act, 54 Pa. Cons. Stat. §§ Ann.1101 to 1126 and the Pennsylvania Unfair Trade Practices and Consumer Protection Law 73P.S. §§ 201-1 to 201-9.3.

PLAINTIFFS

5. Henry Fambrough, ("Plaintiff") is a citizen of the State of Michigan and Owner of Spinners Performing Arts, LLC, d/b/a "The Spinners" a registered trademark and service mark with the U.S. Patent & Trademark Office, U.S. Service Mark Registration No. 1,061,389. Said trademark has been continuously renewed since March 15, 1977 and is valid through March 15, 2026. See Exhibit "A", attached.

6. Spinners Performing Arts, LLC ("Plaintiff" herein, a/k/a SPA) is a limited liability company, organized and existing, pursuant to the laws of the State of Michigan, with its principal office and registered address located in the City of Troy, Oakland County, Michigan.

DEFENDANTS

Frank Washington

7. Defendant Frank Washington is a citizen and resident of the State of Pennsylvania and resides in the City of Philadelphia, Philadelphia County.

8. Defendant, Frank Washington (hereinafter "Washington"), whom it is believed is affiliated and/or associated with Defendants John Does 1 through 10, Andrea Jackson and businesses controlled by Andrea Jackson, to wit: AMJ Entertainment, AMJ Management Group and AMJ Entertainment Events.

9. Washington is an individual whom Plaintiffs are informed and believe, and based on such information and belief and facts set forth herein this complaint, has performed, is performing, and/or will continue to publicly perform as a lead and/or principle member of a fraudulent group, styling themselves as "Frank Washington Legendary Lead Singer of The Spinners," and/or as "The Spinners Reunion Show, "The Spinners Revue, featuring Frank Washington and from time to time and other variations of the same, but always presenting and

promoting himself as a member of and/or affiliation and authorized to use names which incorporate the name and mark "The Spinners".

10. Defendant Washington has profited from, and unless enjoined, will continue to profit from, the unauthorized use of Plaintiffs' trade name and service mark, "The Spinners," in violation, infringement and misappropriation of Plaintiffs' right to exclusive use of the name and mark, "The Spinners".

11. Defendant Washington has profited from the unauthorized use of Plaintiffs' trade name and service mark, "The Spinners," in violation, infringement and misappropriation of Plaintiffs' right to exclusive use of the name and mark, "The Spinners" and because of said conduct has caused Plaintiffs significant damage.

Andrea Jackson

12. Defendant Andrea Jackson (herein referred to as "Jackson" and "AMJ") is a resident of the City of Philadelphia, Pennsylvania and owns and conduct business under several pseudonym names AMJ Entertainment, AMJ Management Group, AMJ Entertainment Events.

13. *AMJ* is the initials of Andrea M. Jackson.

14. Jackson and/or AMJ, is an individual whom Plaintiffs are informed and believe, and based on such information and belief, Plaintiffs allege, promoted Washington and Defendants John Doe 1 through 10 to perform, is performing, and/or will continue to publicly perform as a lead and/or principle member of a fraudulent group, styling themselves as "Frank Washington Legendary Lead Singer of The Spinners," and/or as "The Spinners Reunion Show, "The Spinners Revue, featuring Frank Washington and from time to time and variations of the same, but always presenting and promoting the group as a member of and/or affiliation and authorized to use names which incorporate the name and mark "The Spinners".

15. Defendant Jackson and AMJ have profited from, and unless enjoined, will continue to profit from, the unauthorized use of Plaintiffs' trade name and service mark, "The Spinners," in violation, infringement and misappropriation of Plaintiffs' right to exclusive use of the name and mark, "The Spinners".

AMJ Entertainment, AMJ Management Group, AMJ Entertainment Events

16. Defendant Andrea Jackson, through her business activities, owns AMJ Entertainment, AMJ Management Group, AMJ Entertainment Events (collectively referred to herein as "AMJ"). AMJ represents the initials of Andrea M. Jackson.

17. Jackson and/or AMJ, is an individual whom Plaintiffs are informed and believe, and based on such information and belief, Plaintiffs alleges, promotes Washington and Defendants John Doe 1 through 10 to perform, is performing, and/or will continue to publicly perform as a lead and/or principle member of a fraudulent group, styling themselves as "Frank Washington Legendary Lead Singer of The Spinners," and/or as "The Spinners Reunion Show, "The Spinners Revue, featuring Frank Washington and from time to time other variations of the same, but always presenting and promoting a rouge group comprised of Frank Washington and others as a member of and/or affiliation and authorized to use names which incorporate the name and mark "The Spinners".

18. Defendants, AMJ Entertainment, AMJ Management Group, AMJ Entertainment Events, all controlled and operated by Jackson, have profited from, and unless enjoined, will continue to profit from, the unauthorized use of Plaintiffs' trade name and service mark, "The Spinners," in violation, trademark, by infringement and misappropriation of Plaintiffs' right to exclusive use of the name and mark, "The Spinners".

John Does 1 through 10

19. Plaintiffs are informed and believe, and based on such information and belief allege, that the Defendants herein named, including, without limitation, one or more of the Defendants fictitiously named herein as JOHN DOES 1 through 10, and each of them, "did in fact" and continue, including Defendants Washington, Jackson and her several businesses, under the AMJ pseudonym, promote and attempt to promote, advertise, and license the performance of groups, calling themselves as "Frank Washington Lead Singer of The Spinners," "Legendary Lead Singer of The Spinners", "The Motown Spinners", The Spinners Revue and variations thereof and similar names, at locations, throughout United States.

20. Plaintiffs are informed and believe, and based on such information and belief

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alleges, that none of the Defendants named herein, nor any of them, including, without limitation, any of the fictitiously-named Defendants, JOHN DOES 1 through 10, inclusive, hold any legal right, either jointly or severally, to use the name or trade upon the goodwill associated with the name and mark "The Spinners," or any misleadingly similar incarnation or variant of that name.

21. Plaintiffs are informed and believe, and based on such information and belief alleges, that one or more of the Defendants herein named, and each of them, including, without limitation, one or more of the fictitiously-named Defendants, JOHN DOES 1 through 10, inclusive, and each of them, did advertise, promote, and/or exhibit the performance of a group or groups are wrongfully claiming to be and referring to themselves as " Frank Washington Legendary Lead Singer of The Spinners," "The Spinners Reunion Show," "The Spinners Revue" and/or similar names for the very purpose of trading on the goodwill of the name of "The Spinners" which Plaintiffs have fostered and worked hard to protect.

22. The active conduct of all of these Defendants through advertisement, promotion, and/or licensing of the performance of these fraudulent groups, wrongfully and misleadingly calling, referring, associating, and/or affiliating themselves as The Spinners, or any similar incarnation of that trade name, such as " Frank Washington Legendary Lead Singer of The Spinners, "Spinners Revue, "The Spinners Reunion Show," "The Spinners Celebration," *etc.*, did and will confuse, mislead, and/or deceive the concert venues and the consuming public into thinking that such counterfeit group is in some manner associated or affiliated with, or in some manner sponsored or endorsed by, "The Spinners" and Plaintiffs.

23. The dissemination of false advertisements by any means for the purpose of inducing, or which is likely to induce, directly or indirectly, the purchase by consumers of tickets to live performances by groups styling themselves as " Frank Washington Legendary Lead Singer of The Spinners," "The Spinners Reunion Show, "The Motown Spinners" "The Spinners Revue" and/or similar names, is unlawful pursuant to, *inter alia*, the Lanham Act, 15 U.S.C. §§ 1051, 52, *et seq.*, as unfair methods of competition in or affecting commerce, and as unfair or deceptive acts or practices in or affecting commerce.

24. Plaintiffs are informed and believe, and based on such information and belief alleges, that prior to the acts complained of herein, the Defendants herein named, and each of

them, including, without limitation, fictitiously-named Defendants JOHN DOES 1 through 10, and each of them, had actual knowledge or constructive notice that Plaintiffs holds sole and exclusive rights, title, and interest in and to the name “The Spinners” for any and all public performances, and that any promotion or attempted licensing of any performance of “Frank Washington Legendary Lead Singers of The Spinners,” The Spinners Revue, “The Spinners Reunion Show,” and/or similar derivative names, would be an infringement and misappropriation of Plaintiffs’ exclusive rights and interest in maintaining the integrity and goodwill of the mark.

Common Conduct of All Defendants

25. Plaintiffs are informed and believe, and based upon such information and belief alleges, that the Defendants herein named, including fictitiously named Defendants DOES 1 through 10, and each of them, conducted this wrongful use and exploitation of the name and mark “The The Spinners,” and will continue to do the same, knowing that “The Spinners” is a registered trade name and service mark controlled exclusively by Plaintiffs with respect to any and all public performances, as hereinafter set forth, knowing that none of the Defendants has any legal right to use and exploit the name for personal commercial gain, knowing that Plaintiffs hold the sole exclusive rights to performances under the name, and knowing that Plaintiffs has not given them or any of the Defendants any right or authority to use the name in any manner.

26. Plaintiffs are informed and believe and based on such information and belief allege that as to named Defendants and certain unnamed and unknown Defendants, Plaintiffs have no adequate remedy at law.

27. The conduct of Defendants and of each of them, including, without limitation, fictitiously-named Defendants JOHN DOES 1 through 10, and each of them, as described above, have caused and, if not enjoined, will continue to cause irreparable damage to Plaintiffs’ right and title to the name, reputation, and goodwill of “The Spinners.”

28. Plaintiffs are informed and believe, and based on such information and belief allege, that, Plaintiffs’ remedy versus the Defendants for past conduct of staging fraudulent performances of a knockoff group promoting same as “The Spinners”, is damages and future

injunctive relief, including money damages at law.

**PLAINTIFFS HOLD SOLE AND EXCLUSIVE RIGHTS TO PERFORM
UNDER THE TRADEMARK, SERVICE MARK AND TRADE NAME
"THE SPINNERS"**

29. The Plaintiffs re-affirm by specific reference herein, as if stated word for word, all paragraphs, numbers 1 through 28 of this Complaint as if fully re-written herein, against the Defendants, Washington, Jackson, AMJ and John Does 1 through 10, inclusive.

30. "The Spinners" is, and has been, a renowned singing and performing vocal group since its hugely popular beginning in 1960.

31. The group, "The Spinners" has recorded, produced, performed, and is eminently identified with numerous hit songs such as *"Could It Be I'm Falling in Love"*; *"That's What Girls are Made For"*, *"The Games People Play"*, *"Mighty Love"*, *It's a Shame"* *Cupid"*, *"Sadie"* and *"Rubber Band Man"*.

32. The Spinners formed their vocal singing group, while in high school, Ferndale Michigan. In the early sixty's, they signed a recording agreement with Motown Records, Detroit, Michigan. The group stayed with Motown Records until their departure and signing in 1971 with Atlantic Records, New York. They are and have been globally known as "THE SPINNERS".

33. There is no American group authorized and permitted to perform using the Name "The Spinners".

34. "The Spinners" have performed their hits world-wide making them popular favorites and recognizable to countless fans throughout the world. The group "The Spinners" is responsible for millions of records sold both nationally and internationally.

35. Plaintiff Fambrough, the original member of the group "The Spinners" since its inception, has spent over sixty years of his life building, husbanding, and protecting the name, "The Spinners".

36. From the inception of the group "The Spinners," the Plaintiffs have continued to record, perform and entertain world-wide as "The Spinners."

37. At all times, since the beginning of "The Spinners," Plaintiffs have been careful to

protect the goodwill associated with the name and image of "The Spinners."

38. "The Spinners" is a registered trademark and service mark registered in the Principal Register of the United States Patent Office, on Application, June 23, 1975, Registered March 15, 1977., US Serial Number: 73055949; U.S. Registration Number: 1,061,389.

39. The name and trademark has since its inception been owned, without interruption, by the original members, all of whom are now deceased, except Henry L. Fambrough.

40. The Spinners have performed without interruption as "The Spinners", since the early 1960's and have never stopped performing as such. There is no such entity or acronym as Spinners Revue, Motown, Detroit, Legendary Singer, or otherwise permitted or authorized use of their name.

41. Plaintiffs proffer and urge this Court take judicial notice of that certain action entitled, *Spinners Performing Arts, Inc. versus William Henderson, et al et al., American Arbitration Association, Case Number 13 140 01044 04, Exhibit " B "* attached, the judgment entered therein confirming Plaintiffs' rights in and to the name "The Spinners," and permanently enjoining the defendants therein from performing under the name, "The Spinners" and any variation thereof" and from engaging in other acts in competition with the true owner of such name and Mark.

42. Plaintiffs proffer and urge this Court take judicial notice of that certain action entitled, *Fambrough, Spinners Performing Arts, Inc. v. G.C. Cameron, et al , United States District Court, for the Southern District of Mississippi, No. 5:13cv46-DCB-MTP, Exhibit "C",* attached, the judgment entered therein, confirming Plaintiffs' rights in and to the name "The Spinners," and permanently enjoining the defendants therein from performing under the name, "The Spinners" and any variation thereof" and from engaging in other acts in competition with the true owner of such name and Mark.

45. Plaintiffs are informed and believe, and thereon allege, that Frank Washington and the individual Defendants who are currently performing under the names "Legendary Lead Singer of The Spinners" and/or The Spinners Revue Show "The Spinners Reunion Show," "Motown Spinners", including, without limitation, one or more of the fictitiously-named Defendants sued herein, fall within the scope of a permanent injunction entered by other Courts and that they have actual or constructive notice of such injunction, and that their conduct as

herein alleged, in addition to being actionable herein, constitutes a violation of those actions.

46. This assertion is particularly true of Defendant Frank Washington, who has been a rouge Defendant of the same conduct, promoting a fraudulent knockoff group, repeatedly in the past around the country and continues to do so at the very filing of this complaint.

**DEFENDANTS' ACTS OF TRADEMARK INFRINGEMENT, MISAPPROPRIATION,
UNFAIR COMPETITION AND FRAUD**

47. The Plaintiffs re-affirm by specific reference herein, as if stated word for word, all paragraphs, numbers 1 through 46 of this Complaint as if fully re-written herein, against the Defendants, Washington, Jackson, AMJ and John Does 1 through 10, inclusive.

48. The Defendant Frank Washington has never been a member owner of The Spinners".

49. The Defendant Frank Washington's voice has never been recorded on any song performed by The Spinners.

50. Defendant Frank Washington has never recorded with The Spinners on any record or album released by any record company under the name, "The Spinners".

51. The Defendant Washington was only and for a brief time, after the death of a member of the group, hired as a singer to perform with the Spinners from approximately 2003 to around 2006.

52. The Defendant Washington was hired to fill in a spot after the death of an original member of The Spinners and at no time ever, was he a lead singer for The Spinners.

53. Defendant Washington was terminated as an "employee singer" on or about 2006 for The Spinners.

54. Defendant Washington, before and after termination, was told and knew he had no right or authority to organize and create a fraudulent group using the name, performances and trademark of The Spinners.

55. The Spinners do not, nor have they ever designated and/or promoted the Group as having a Lead Singer, for the reason, all singers in the group sign vocal parts of very song and harmony.

56. Plaintiffs are informed and believe, and based on such information and belief, allege that Defendant Washington and others with him, sued herein, including, without limitation, those

fictitiously named, began using, attempting to use, or to license others to use, and “The Spinners” name in connection with live musical performances, misleading the public he and they are “The Spinners”.

57. Plaintiffs are informed and believe, and based on such information and belief, allege that Defendant Washington, Andrea Jackson, AMJ Entertainment, AMJ Management Group, AMJ Entertainment Events sued herein, including, without limitation, those fictitiously named, acting in concert, each with the others, began booking public performances using the name “Frank Washington Legendary Lead Singers of The Spinners”, Spinners Revue Show and/or “The Spinners Reunion Show,” or similar derivative names, all of which intentionally and prominently portray to the public, they are paying to see and hear the real group “The Spinners”.

58. The Defendant Washington, Jackson and John Does 1 through 10 have repeatedly engaged in this offensive conduct to the detriment and damage of The Spinners.

59. Defendant Washington, after admitting he was violating The Spinners Trademark continues to repeat the same conduct, flaunting his indifference to the rights of The Spinners.

60. Defendants and all of them booked a concert venue and performance, October 13, 2018 at the Harris-Stowe State University in St. Louis, MO, boldly representing Washington and his group was the real group, The Spinners”.

61. Examples of such unlawful usage is hereto appended as Exhibit “D”, to this instant complaint, and incorporated herein by this reference.

62. As a result of this unlawful conduct, Plaintiffs were caused to expend substantial legal fees and costs to stop this performance in St. Louis, appropriating the use, the name and the Mark of “The Spinners”.

63. Notwithstanding the Defendant's admission to trademark violation and his agreement to cease and desist, agreed to in Exhibit “E”, attached, Plaintiffs discovered just recently, a continuing use of The Spinners name, use likeness and reputation, by Washington and the Defendants, this time in the City of North Las Vegas. Exhibit “F”, attached hereto and incorporated herein by reference.

64. This new booking, and the associated advertising, particularly with respect to website advertising, is false and misleading and intentionally promotes the belief this upcoming performance is a Spinners Performance, when in fact it is not!

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65. The advertising, websites, marketing, marquees, and other visual presentations in relation to such performances are misleadingly presented in such a manner as to improperly emphasize the name "The Spinners,"

66. The actual usage in advertising, particularly with respect to website advertising, is false and misleading.

67. Presentation of performances through such misleading and deceptive advertising is unlawful, and a fraud on the public, willfully misleading consumers to reasonably believe that they are purchasing tickets to see "The Spinners," when in truth and in fact, they are purchasing tickets to see an unauthorized and unlawful counterfeit group that has absolutely no relationship to "The Spinners".

68. Moreover, the presentation of performances by such counterfeit groups constitutes unfair competition in respect to Plaintiffs and Plaintiffs' exclusive rights in and to all public performances under the name "The Spinners," in that, such counterfeit groups can and do book and perform in venues which might, otherwise, hire Plaintiffs to perform.

69. Plaintiffs are informed and believe that those Defendants who perform within such counterfeit groups, and those Defendants which own, manage or control those counterfeit groups, regularly provide the services of those groups for rates and fees considerably lower than the standard rates and fees charged by Plaintiffs for performances by "The Spinners," providing an economic incentive to venues, to participate in Defendants' deceptive enterprise and pattern of unlawful activities.

70. Moreover, the terms under which these counterfeit groups are engaged is especially disruptive and damaging to Plaintiffs and to Plaintiffs' professional reputation and stature, in that these counterfeit groups regularly accept "billing" in third or lower position in advertising and on marquees, on which only the name "The Spinners" appears in larger, bold letters. Such billing degrades the name "The Spinners," and dilutes the value thereof.

71. Plaintiffs, performing as "The Spinners" are regularly billed as the headline act in venues where Plaintiffs perform, but Defendants' conduct and pattern of unlawful activity does and did interfere with Plaintiffs ability to command such "star" billing, and fees commensurate with such billing.

72. Plaintiffs are further informed and believe, and based on such information and belief,

allege that Defendants performed, or have purported to license others to perform, under the name "Legendary and/or Lead Singer of The Spinners", "Spinners Revue", or other, confusingly similar names which are derivative of, or otherwise misleadingly include, the name and mark "Spinners,".

73. Plaintiffs are further informed and believe, and based on such information and belief, allege that Defendants have performed, or have purported to license others to perform, and continue to perform, under the name "Legendary Lead Singers of The Spinners" and/or "The Spinners Reunion Show", "Spinners Revue" or other, similar names which include or are derived from the name and mark, "The Spinners," employed in such manner as is likely to confuse or deceive consumers, in various locations throughout the United States, and elsewhere.

74. The advertisement, promotion, performance, and/or exhibition of any group calling itself "The Spinners" or any name which prominently includes the name "The Spinners," will and has confused, misled, and/or deceived the general public into thinking that such group is "The Spinners," or is associated or affiliated in some manner with "The Spinners" name owned by Plaintiffs, or is in some manner sponsored or endorsed by Plaintiffs and/or by "The Spinners."

75. Plaintiffs are informed and believe, and based on such information and belief, allege that the advertising, promotion, performance, and/or licensing of the name "The Spinners" or any similar incarnation of the name, by Defendants, is for the very purpose of trading on the goodwill associated with the name of "The Spinners" which Plaintiffs have fostered and worked hard to protect.

76. Plaintiffs are informed and believe, and based on such information and belief, allege that Defendants are continuing to attempt to exploit the name "The Spinners" and/or derivatives thereof in an attempt to confuse, mislead, and deceive the public for personal commercial gain.

77. Plaintiffs are informed and believe, and based on such information and belief, allege that Defendants have wrongfully used and exploited the name "The Spinners," and continue to do the same, knowing that the rights to perform "The Spinners" are owned exclusively by Plaintiffs, knowing that Defendants have no legal right to use, license or exploit the name for personal commercial gain, or otherwise, and knowing that Plaintiffs hold the sole exclusive performance rights or authority to use the name in connection with live performances.

78. Plaintiffs are informed and believe that some of the Defendants herein named,

including some or all of those referenced, have a regular, ongoing enterprise and pattern of activity which involves the formation, management, false advertising by means of the internet and otherwise, and public performances by such counterfeit groups, and that the groups styling themselves “Legendary Lead Singers of The Spinners,” and “The Spinners Reunion Show,” “Spinners Revue” and similar names derivative of Plaintiffs name and mark, are but two examples of Defendants’ unlawful activities.

79. Plaintiffs have no adequate, immediate remedy at law other than by the within action. The conduct of Defendants described above, has caused and, if not enjoined, will continue to cause, irreparable damage to Plaintiffs’ rights and title to the name, the reputation, and goodwill of the name “The Spinners.”

80. The advertising, websites, marketing, marquees, and other visual presentations, used by the Defendants, collectively, in relation to such performance was fraudulent and misleadingly presented in such a manner as to improperly emphasize the name “The Spinners,” thusly,

FIRST CLAIM FOR RELIEF
(False Designation of Origin and False Description)
[15 U.S.C. section 1125(a)]

72. The Plaintiffs re-affirm by specific reference herein, as if stated word for word, all paragraphs, numbers 1 through 71 of this Complaint as if fully re-written herein, against the Defendants, Washington, Jackson, AMJ and John Does 1 through 10, inclusive.

73. Plaintiffs are informed and believe, and based on such information and belief alleges, that at all times relevant hereto, Plaintiffs owned all right, title, and interest in and to the trade name and service mark “The Spinners” for the purpose and in the manner alleged above.

74. Plaintiff’s trade name and service mark “The Spinners,” as set forth above, has been used throughout the United States and the World and is extremely well known to members of the purchasing public.

75. The public generally associates and identifies the trade name and service mark of “The The Spinners” with Plaintiffs, who are the originators of the group bearing that name and

who have continually performed under that name since the early 1960s.

76. Defendants' conduct in the licensing, advertisement and/or promotion of performances under the name "The Spinners" or any similar variance of or expansion upon that name, constitutes false designation of origin or sponsorship of said performance, intends to falsely represent that said performance has been sponsored, approved or licensed by Plaintiffs or is in some way associated or affiliated with Plaintiffs.

78. Such conduct of Defendants is likely to confuse, mislead, and deceive Defendants' customers, purchasers and/or promote or cause said persons to believe that these performances have been sponsored, approved, authorized or licensed by Plaintiffs, or are in some way associated or affiliated with Plaintiffs, in violation of 15 U.S.C. section 1125(a).

79. Plaintiffs have been damaged by, and Defendants have profited from their wrongful conduct in an amount to be proven at trial. This is an extraordinary case and such damages should be trebled.

80. Plaintiffs have no adequate remedy at law. The conduct of Defendants as described above, has caused and, if not enjoined, will continue to cause irreparable damage to Plaintiffs' right and title to the name, reputation, and goodwill of "The Spinners."

SECOND CLAIM FOR RELIEF
(Trade Dress Infringement)
[15 U.S.C. Section 1125(a)]

81. The Plaintiffs re-affirm by specific reference herein, as if stated word for word, all paragraphs, numbers 1 through 80 of this Complaint as if fully re-written herein, against the Defendants, Washington, Jackson, AMJ and John Does 1 through 10, inclusive.

82. Plaintiffs alleges that the above-named Defendants, by their acts, have competed unfairly with Plaintiffs and have misappropriated and traded upon the goodwill and business reputation of the mark "The Spinners."

83. Plaintiffs alleges that said use of the trade dress mentioned above by Defendants constitutes a false description and misrepresentation that the musical performances are made by, sponsored by, or affiliated with Plaintiffs. The acts constitute a violation of 15 U.S.C., section 1125(a) in that Defendants have used Plaintiffs' trade name and service mark "The Spinners"

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in connection with the acts set forth above.

84. Defendants have unfairly competed with Plaintiffs in violation of 15 U.S.C. Section 1125(a).

85. Plaintiffs has been and is likely to be damaged by such false descriptions or representations by reason of the likelihood that the purchasers will be confused as to the true source, sponsorship or affiliation of the performances promoted, licensed and/or advertised by Defendants.

86. Plaintiffs has been damaged by, and Defendants have profited from their wrongful conduct in an amount to be proven at trial.

87. Plaintiffs have no adequate remedy at law. Defendants' acts have caused and, if not enjoined, will continue to cause irreparable damage to Plaintiffs.

THIRD CLAIM FOR RELIEF
(Federal Trademark Dilution)
[15 U.S.C. Section 1125(c)]

89. The Plaintiffs re-affirm by specific reference herein, as if stated word for word, all paragraphs, numbers 1 through 87 of this Complaint as if fully re-written herein, against the Defendants, Washington, Jackson, AMJ and John Does 1 through 10, inclusive.

90. Plaintiffs' trade name "The Spinners" as set forth in the preceding paragraphs hereof, is distinctive and famous, has been used throughout the United States and the World and is extremely well known to the trade and members of the purchasing public. The public generally associates and identifies Plaintiffs' trade name "The Spinners" with Plaintiffs and the group they created in the early 1960s.

91. Defendants' conduct in the licensing, advertising and/or promoting, of performances of groups performing and/or exhibiting acts which have the same, or misleadingly similar, name as "The Spinners" constitutes dilution of Plaintiffs' trade name "The Spinners" in that such conduct dilutes the distinctive quality of said name by diminishing Plaintiff's ability to identify and distinguish its goodwill and performances, in violation of 15 U.S.C. Section 1125(c).

92. Plaintiffs has been damaged by and Defendants have profited from, their wrongful

conduct in an amount to be proven at trial.

93. Upon information and belief, Defendants actions were done willfully and with an intent to exploit Plaintiffs reputation and goodwill, and to dilute the trade name "The Spinners," wherefore damages awarded to Plaintiffs should be trebled.

94. Plaintiffs have no adequate remedy at law. The conduct of Defendants described above has caused and, if not enjoined, will continue to cause irreparable damage to the rights of Plaintiffs and the trade name "The Spinners," and to Plaintiffs' business reputation and goodwill.

FOURTH CLAIM FOR RELIEF
(For Declaratory Relief to Quiet Plaintiffs' Title and Exclusive Right to
Use the Name "The Spinners" for Public Performances)
[15 U.S.C. 1125]

95. The Plaintiffs re-affirm by specific reference herein, as if stated word for word, all paragraphs, numbers 1 through 94 of this Complaint as if fully re-written herein , against the Defendants, Washington, Jackson , AMJ and John Does 1 through 10, inclusive.

96. Pursuant to the provisions of 15 U.S.C. § 1125, Plaintiffs are entitled to declaratory relief by a judicial order and decree, affirming that Plaintiffs are the sole owner of all rights, title and interest with regard to live performances under the trade name "The Spinners," and specifically quieting Plaintiff's title in and to all live public performance uses of the name "The Spinners," including any and all names which prominently incorporate the name "The Spinners" in such manner as would cause a reasonable consumer to conclude or assume that a group performing under such name was licensed by, or authorized by, or otherwise affiliated with Plaintiffs or "The Spinners."

FIFTH CLAIM FOR RELIEF
(For Preliminary and Permanent Injunction)
[15 U.S.C. 1116; FRCP65]

97. The Plaintiffs re-affirm by specific reference herein, as if stated word for word, all paragraphs, numbers 1 through 96 of this Complaint as if fully re-written herein , against the

Defendants, Washington, Jackson, AMJ and John Does 1 through 10, inclusive.

98. Plaintiffs have suffered, and will likely continue to suffer, inestimable and irreparable damage by reason of Defendants' conduct as herein alleged.

99. Plaintiffs have no speedy remedy at law to curtail Defendants' ongoing, unauthorized use of Plaintiff's trade dress, trade name and service mark, "The Spinners."

100. Plaintiffs are entitled to and seek hereby, a preliminary and permanent injunction as against the Defendants herein, and each of them, and their respective representatives, successors, affiliates, agents, officers, principals, employees, trustees, heirs and assigns, and each of them, commanding them, at their peril, to immediately cease and desist, and at all future times refrain, from public use for any performance, or for advertising, or in any commercial manner whatsoever, the name "The Spinners," or any name which includes the word "Spinners" or "The Spinners," or the phrase "The Spinners," unless by the express written authorization of Plaintiffs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand that:

Defendants, their agents, servants, employees, representatives, licenses, successors, and assigns, and all person, firms, or corporations in active concert or participation with any of them, be immediately, preliminarily, and permanently enjoined from:

- a. Directly or indirectly infringing upon the goodwill associated with Plaintiffs' service Mark;
- b. Directly or indirectly infringing the trade name "The Spinners", or using Plaintiffs' trade name in any manner, including generally but not limited to, advertising, promoting and/or licensing the performance of any group or individual that infringes said trade name or Plaintiffs' name, or a derivative thereof;
- c. Engaging in any conduct that tends falsely to represent that, or is likely to confuse, mislead, or deceive purchasers, Defendants' customers, and/or members of the public to believe that the actions of Defendants, including the advertisement, promotion, performance, and/or licensing of any performance or performers under the name "The Spinners, or any similar incarnation of the name, are sponsored, approved or licensed by Plaintiffs, or are in some way

associated, affiliated or connected with Plaintiffs and/or "The Spinners";

d. From Affixing, applying, annexing or using in connection with the advertisement, promotion, performance, and/or licensing of any performance or performers under the name "The Spinners," photos, statement, or any similar incarnation of the name, or including a false description of representation, including words or other symbols, tending falsely to describe or represent such good or services as being those of Plaintiffs;

e. Otherwise competing unfairly with Plaintiffs in any manner;

f. Diluting and infringing the trade name "The Spinners" and/or damaging Plaintiffs' goodwill, reputation, and business;

FURTHER, Plaintiffs demand that:

Defendants be ordered to destroy and otherwise dispose of:

a. Any unauthorized licensing, promotional and advertising material, agreements, labels, announcements, signs, and any other unauthorized items which reproduce, copy, imitate, or bear the trade name "The Spinners";

b. Any sales and supplier or customer journals, ledgers, invoices, purchase orders, inventory control documents, bank records, catalogues, or recordings of any type whatsoever and all other business records and documents believed to concern the unauthorized and infringing use of advertisement, promotion, performance, and/or licensing of "The Spinners" or any similar incarnation of the name, and the proceeds which resulted therefrom; and

c. remove and cease the use of any and all electronic means, postings, including commercial and social media postings and use of the name, The Spinners, in any form fashion and variation thereof;

FURTHER, Plaintiffs pray an order be issued:

Defendants' Defendants be required to pay actual damages, increased to the maximum extent provided by law.

Defendants be required to account for and pay over to Plaintiffs all damages sustained by Plaintiffs and profits realized by Defendants by reason of their unlawful acts herein alleged and that those profits be increased as provided by law and those profits or damages be trebled.

Defendants pay punitive damages to Plaintiffs for Defendants' oppression, fraud and

malice in connection with their violation of Plaintiffs' rights under applicable law, particularly the Magnolia Defendants, who, notwithstanding notice and demand to cease, proceeded with putting on the concert with a group known to be fraudulent.

Defendants be deemed to be holding, as constructive trustees for the benefit of Plaintiffs, any and all personal and/or real properties and assets consisting of and/or obtained by profits derived from Defendants' infringing activities and that Plaintiffs be granted possession of these properties.

Plaintiffs recover interest on all damages awarded at the maximum rate permitted by law.

Plaintiffs recover from Defendants their reasonable legal fees.

Defendants, within thirty (30) days after the service of judgment herein, be required to file with the court and serve upon Plaintiffs' attorneys, a written report under oath setting forth in detail the manner by which it has complied with the judgment.

The Court issue a judicial finding and decree affirming Plaintiffs' exclusive right to use, and to license others to use, the name "The Spinners" for all public performance purposes, quieting Plaintiffs' title therein, and providing a ready means by which Plaintiffs may thereafter speedily prevent or remedy any third party's unauthorized use of that name or any derivative name or confusingly similar name.

That Plaintiffs have all other and further relief as the court may deem just and proper under the circumstances.

Dated this, the 8th day of February, 2019.

Respectfully Submitted,

LUTHER E. WEAVER

By: 

Luther E. Weaver (Bar No. 17827)

Attorney for Plaintiffs

OF COUNSEL:

LUTHER E. WEAVER

Paul Mathis, Jr., Esq. (MS. No. 8993; MI Bar No. P-24761)

PAUL MATHIS, LLP

716 Tampa Dr. (38701)

P. O. Box 936

Greenville, MS 38702-0936

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Facsimile: (662) 332-6668

Email: paulmathis@bellsouth.net

VERIFICATION**SPINNERS PERFORMING ARTS, LLC, D/B/A "THE SPINNERS"**

By: Henry Fambrough
 ✓ HENRY L. FAMBROUGH, Owner /Managing Member

HENRY L. FAMBROUGH

Henry Fambrough
 ✓ HENRY L. FAMBROUGH, Individually

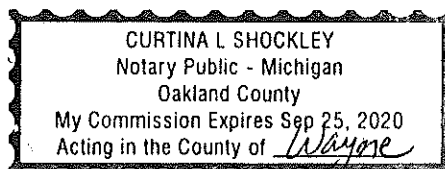
STATE OF MICHIGAN
 COUNTY OF OAKLAND

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for said County and State, HENRY L. FAMBROUGH who acknowledged that he is the OWNER AND MANAGING MEMBER OF **SPINNERS PERFORMING ARTS, LLC** and that for and on behalf of **SPINNERS PERFORMING ARTS, LLC**, he has read the contents of this Verified Complaint and attests the factual averments are accurate and as to those matters stated hereon on information and belief, he verily believes them to be accurate as well. Accordingly, this Complaint is signed, sealed and delivered, on the day and year herein stated, he having been first duly authorized so to do.

Given Under My Hand and Official Seal this, the 23rd day of January, 2019.

Curtina L. Shockley
 NOTARY PUBLIC

My Commission Expires: 09/25/2020



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SPINNERS PERFORMING ARTS, LLC, D/B/A "THE SPINNERS"
AND HENRY L. FAMBROUGH

PLAINTIFFS

VS

CIVIL ACTION NO. _____

FRANK WASHINGTON, INDIVIDUALLY, HIS AGENTS
AND JOHN DOES 1-10, ACTING IN CONCERT WITH HIM;
ANDREA JACKSON, INDIVIDUALLY; AMJ ENTERTAINMENT GROUP,
AMJ MANAGEMENT, and AMJ ENTERTAINMENT EVENTS

DEFENDANTS

_____ /

EXHIBIT A

TO

VERIFIED COMPLAINT

Int. Cl.: 41

Prir U.S. Cl.: 107

United States Patent Office

Reg. No. 1,061,389

Registered Mar. 15, 1977

SERVICE MARK

Principal Register

THE SPINNERS

The Spinners (partnership)
2688 W. Grand Blvd.
Detroit, Mich. 48208

For: ENTERTAINMENT SERVICES—NAMELY,
PERFORMANCES BY A VOCAL GROUP—in CLASS
41 (U.S. CL. 107).

First use on or about Dec. 31, 1961; in commerce on
or about Dec. 31, 1961.

Ser. No. 55,949, filed June 23, 1975.

R. F. CISSEL, Examiner

Int. Cl.: 41

Prir U.S. Cl.: 107

United States Patent Office

Reg. No. 1,061,389

Registered Mar. 15, 1977

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Principal Register

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R. F. CISSEL, Examiner

Int. Cl.: 41

Prior U.S. Cl.: 107

United States Patent and Trademark Office

10 Year Renewal

Reg. No. 1,061,389

Registered Mar. 15, 1977

Renewal Term Begins Mar. 15, 1997

**SERVICE MARK
PRINCIPAL REGISTER**

THE SPINNERS

SPINNERS, THE (PARTNERSHIP)
12936 TEWKSBURY LANE
TROY, MI 48098

FOR: ENTERTAINMENT SERVICES—
NAMELY, PERFORMANCES BY A

VOCAL GROUP, IN CLASS 41 (U.S. CL.
107).

FIRST USE 12-31-1961; IN COMMERCE
12-31-1961.

SER. NO. 73-055,949, FILED 6-23-1975.

*In testimony whereof I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on June 3, 1997.*

COMMISSIONER OF PATENTS AND TRADEMARKS

From: TMOOfficialNotices@USPTO.GOV
Sent: Monday, October 31, 2016 11:00 PM
To: docket@pallaw.com
Subject: Official USPTO Notice of Acceptance and Renewal Sections 8 and 9: U.S. Trademark RN 1061389: THE SPINNERS: Docket/Reference No. SPT-30119/02

Serial Number: 73055949
Registration Number: 1061389
Registration Date: Mar 15, 1977
Mark: THE SPINNERS
Owner: SPINNERS PERFORMING ARTS, L.L.C.

Oct 31, 2016

NOTICE OF ACCEPTANCE UNDER SECTION 8

The declaration of use or excusable nonuse filed for the above-identified registration meets the requirements of Section 8 of the Trademark Act, 15 U.S.C. §1058. **The Section 8 declaration is accepted.**

NOTICE OF REGISTRATION RENEWAL UNDER SECTION 9

The renewal application filed for the above-identified registration meets the requirements of Section 9 of the Trademark Act, 15 U.S.C. §1059. **The registration is renewed.**

The registration will remain in force for the class(es) listed below for the remainder of the ten-year period, calculated from the registration date, unless canceled by an order of the Commissioner for Trademarks or a Federal Court.

Class(es):
041

TRADEMARK SPECIALIST
POST-REGISTRATION DIVISION
571-272-9500

REQUIREMENTS FOR MAINTAINING REGISTRATION IN SUCCESSIVE TEN-YEAR PERIODS

WARNING: Your registration will be canceled if you do not file the documents below during the specified time periods.

What and When to File: You must file a declaration of use (or excusable nonuse) and an application for renewal between every 9th and 10th-year period, calculated from the registration date. See 15 U.S.C. §§1058, 1059.

Grace Period Filings

The above documents will be considered as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

*****The USPTO WILL NOT SEND ANY FURTHER NOTICE OR REMINDER OF THESE REQUIREMENTS. THE REGISTRANT SHOULD CONTACT THE USPTO ONE YEAR BEFORE THE EXPIRATION OF THE TIME PERIODS SHOWN ABOVE TO DETERMINE APPROPRIATE REQUIREMENTS AND FEES.*****

To view this notice and other documents for this application on-line, go to <http://tdr.uspto.gov/search.action?sn=73055949>. NOTE: This notice will only be available on-line the next business day after receipt of this e-mail.



JAN
25

The Spinners at Bethesda Blues & Jazz Supper Club

Public · The Mighty Spinners



Interested



Going



Share



More



15 going including Heather Leigh



Friday, Jan 25 at 8 PM - 11 PM

Bethesda, MD Time · 4 days from now · 18–34°F
Partly Cloudy



Bethesda Blues & Jazz Supper Club

7719 Wisconsin Ave, Bethesda, Maryland 20814





Whitepine Entertainment, LLC
Nat Burgess / Jaclyn Burgess
406-396-3079

The Spinners

Paradise Artist, Inc.
Howie Silverman
805-646-8433

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SPINNERS PERFORMING ARTS, LLC, D/B/A "THE SPINNERS"
AND HENRY L. FAMBROUGH

PLAINTIFFS

VS

CIVIL ACTION NO. _____

FRANK WASHINGTON, INDIVIDUALLY, HIS AGENTS
AND JOHN DOES 1-10, ACTING IN CONCERT WITH HIM;
ANDREA JACKSON, INDIVIDUALLY; AMJ ENTERTAINMENT GROUP,
AMJ MANAGEMENT, and AMJ ENTERTAINMENT EVENTS

DEFENDANTS

_____ /

EXHIBIT B

TO

VERIFIED COMPLAINT

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA**

CASE NUMBER: 03-CA-8580

DIVISION: 39

(Honorable Cynthia Z. Mackinnon)

**WILLIAM HENDERSON, individually,
and on behalf of SPINNERS PERFORMING
ARTS, INC., a dissolved, for-profit Michigan
Corporation with its principal place of
Business in the State of Florida, and
AVA WYNNE, as the widow and sole
beneficiary of Phillippe Wynne, deceased,**

Plaintiffs,

vs.

**LORRAINE W. SMITH, individually,
and SPINNERS PERFORMING ARTS,
INC., a dissolved, for-profit Michigan
Corporation with its principal place
of business in the State of Florida,**

Defendants.

ORDER OF FINAL JUDGMENT

This Cause, coming before this Court upon the Complaint filed by the Plaintiff, William Henderson, versus the within named Defendants, and the Court having the 23rd day of April, 2007, signed and entered an Order on joint motion, dismissing the Plaintiff, Ava Wynne's claims versus the Defendants, with prejudice, and the Court now having been presented with the "Findings of Fact, Conclusions of Law and Summary Judgment", rendered on April 23, 2007, by the American Arbitration Association, disposing of all remaining issues in this case, as between the parties; and the Court being fully advised in the premises, it is therefore and in accordance with Section 682.12 and 682.15 ("providing for confirmation of an award") Florida Statutes (2005):

ORDERED AND ADJUDGED, that

The Findings of Fact, Conclusions of Law and Summary Judgment, issued by the American Arbitration Association, Cause Number 13 140 01044 04, previously filed with this court, is hereby confirmed and adopted, as the Findings of Fact and Conclusions of Law in this case; and

IT IS FURTHER ORDERED AND ADJUGED, that

The Order of Judgment and Order of Summary Judgment is hereby adopted as the Order of Judgment and Summary Judgment of this Court, in this case.

FURTHER,

Appearing that the Arbitrator had before her the issue of injunctive relief, this Court makes specific reference to the language in the Decision and Order, which makes the following findings:

"In the Instant arbitration case the Respondent during the pendency of the case, apparently established a vocal group to compete with his former employer, and in doing so, use the name and likeness thereof. This amounted to no less than self help and a direct appropriation of the name and market value of The Spinners. This conduct is within the scope of arbitration."

The Arbitrator held:

"Injunctive relief is within the scope and authority of arbitration and to not grant it otherwise would undermine the rights of the Claimant to, peaceably and without interference from Respondent, conduct its business.

The Court has been advised of the continuing violation of this prohibition, by those and others who acted in concert with Henderson, during the pendency of these matters, notwithstanding the interim death of Henderson. The Court therefore expressly incorporates verbatim herein the injunctive relief granted by the Arbitrator, to wit:

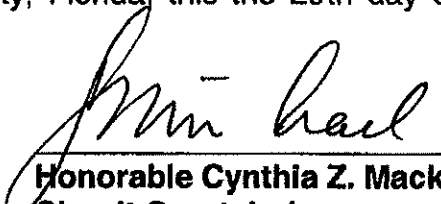
"Respondent William Henderson, his estate, his agent, successors and assigns shall be and they are hereby permanently enjoined from using the name, likeness and

image of The Spinners or any variation thereof."

IT IS FURTHER ORDERED AND ADJUDGED, that

That this Final Order and Judgment, including Permanent Injunction herein, shall extend to all persons who receive notice and copy hereof and SPA, d/b/a, The Spinners shall have the right of enforcement under the laws of full, faith and credit.

Done and Ordered, in Chambers, Orange County, Florida, this the 29th day of May 2007.


Honorable Cynthia Z. Mackinnon
Circuit Court Judge

Conformed Copies to:

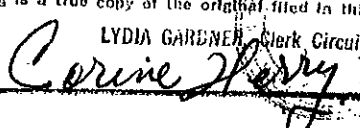
William R. Wohlsifer, Esquire
WOHLSIFER & ASSOCIATES, P.A.
Florida Bar No.: 86827
319 Clematis Street, Suite 811
West Palm Beach, FL 33401
Tel: (561) 655-5114
Fax: (561) 655-7078
Attorney for Ava Wynne

Paul Mathis, Jr., Esquire (MS Bar 8993)
PAUL MATHIS, LLP
P.O. Box 936
365 W. Reed Road, Suite C
Greenville, MS 38702-036
Tel: (662) 332-6660
Fax: (662) 332-6668
Attorney for SPA, Lorraine Smith

Barbara Henderson
138 Sanrobar Drive
Holly Hill, FL 32117

K. Judith Lane, Esquire
444 Seabreeze Boulevard
Suite 900
Daytona Beach, FL 32118

Reginald D. Hicks, Esquire
REGINALD D. HICKS, P.A.
219 Lime Avenue
Orlando, FL 32805
Tel: (407) 422-5758
Fax: (407) 425-2380
Attorney for SPA, Lorraine Smith

STATE OF FLORIDA, COUNTY OF ORANGE
that the above and foregoing is a true copy of the original filed in this office
MAY 28 2007
By  LYDIA GARDNER, Clerk Circuit Court
D.C.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SPINNERS PERFORMING ARTS, LLC, D/B/A "THE SPINNERS"
AND HENRY L. FAMBROUGH

PLAINTIFFS

VS

CIVIL ACTION NO. _____

FRANK WASHINGTON, INDIVIDUALLY, HIS AGENTS
AND JOHN DOES 1-10, ACTING IN CONCERT WITH HIM;
ANDREA JACKSON, INDIVIDUALLY; AMJ ENTERTAINMENT GROUP,
AMJ MANAGEMENT, and AMJ ENTERTAINMENT EVENTS

DEFENDANTS

_____ /

EXHIBIT C

TO

VERIFIED COMPLAINT

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI WESTERN DIVISION

HENRY FAMBROUGH, SPINNERS PERFORMING ARTS, INC. D/B/A "THE SPINNERS"
PLAINTIFFS

V.

CIVIL ACTION NO. 5:13-cv-46 DCB-MTP

GEORGE CAMERON, A/K/A G.C. CAMERON, INDIVIDUALLY
NATCHEZ CASINO OpCo, LLC, D/B/A MAGNOLIA BLUFFS CASINO;
CASINO HOLDING INVESTMENT PARTNERS, LLC;
PREMIER GAMING GROUP, INC.; L & G PRODUCTIONS, LINDA DIXON, A/K/A LINDA
THOMAS, A/K/A LINDA CAMERON, A/K/A LADY L, INDIVIDUALLY
AND THOSE JOHN DOES 1 THROUGH 10 DEFENDANTS

ORDER OF PERMANENT INJUNCTION
AGAINST GEORGE CAMERON, A/K/A G. C. CAMERON, L & G PRODUCTIONS,
LINDA DIXON, A/K/A LINDA THOMAS, AK/A LINDA CAMERON, A/K/A LADY L

Upon the Settlement Agreement and Stipulation of Plaintiffs, Henry Fambrough and Spinners Performing Arts, Inc, d/b/a "The Spinners, professionally known as "The Spinners", and Defendants George Cameron, a/k/a G. C. Cameron and L & G Productions, Linda Dixon, a/ka Linda Thomas, a/k/a Linda Cameron, a/k/a Lady L, for violation of Plaintiffs' trademark in, "The Spinners" name; entry of permanent injunction is **HEREBY GRANTED**,
As follows:

IT IS HERBY ORDERED AND ADJUDGED, Defendants, George Cameron, a/k/a G. C. Cameron and L & G Productions, Linda Dixon, a/ka Linda Thomas, a/k/a Linda Cameron, a/k/a Lady L, his/her and their employees, officers, associates, partners, performance group singers, agents, attorneys, successors, and assigns, and all those in active concert and/or participated with any of them, who shall receive actual notice of this Order, are hereby permanently enjoined from engaging in the following activities, or in any of them:

(1) Directly or indirectly infringing upon the goodwill associated with Plaintiffs' Trade and service mark "The Spinners", officially registered as a trademark and service Mark, U.S. Serial Number 73055949. Accordingly;

(2) Defendants shall not engage in any professional endeavor, including, but not limited to, live or recorded performances or releases of any sound or video recording, with one or more person who describe or promote themselves as "The Spinners", "The Spinners Review", "The Motown Spinners", "The Detroit Spinners", "The Atlantic Records Spinners", "G. C. Cameron featuring The Spinners", "The Spinners, Featuring G.C. Cameron", or any other name likely to be confused with "The Spinners" or "Spinners", without Plaintiffs' express written consent.

(3) Directly or indirectly infringing upon the trade name, "The Spinners" or using Plaintiff's trade name in any manner, including generally but not limited to advertising, promoting, performing, and/or exhibiting the services of Defendant George Cameron, a/k/a G.C. Cameron, or of anyone else that infringes said trade name, "The Spinners" accordingly;

(4) Defendants, all of them referenced in this Order only and G.C. Cameron, his/their agents affiliates, successors, assigns, attorneys, partners and employees are enjoined, anywhere in the world, from orally promoting or describing to a public audience, or from creating, issuing or disseminating to, or having created, issued, or disseminated, any writing distributed or visible to the public, referring to or using the word "Spinners, or any word or name likely to be confused with The Spinners, including, The Spinners", "The Spinners Review", "The Motown Spinners", "The Detroit Spinners", "The Atlantic Records Spinners", "G. C. Cameron featuring The Spinners", "The Spinners, Featuring G.C. Cameron", or any other name likely to be confused with "The Spinners" or "Spinners".

(5) Engaging in any conduct that tends falsely to represent, or is likely to confuse, mislead, or deceive purchasers, Defendants customers, and/or members of the public to believe, that the actions of Defendants, including the advertisement, promotion, performance, and/or exhibition of any performance or under the name "The Spinners," or any similar incarnation of the name, are sponsored, approved, or licensed by Plaintiffs, or are in some way associated, affiliated, or connected with Plaintiffs and/or with "The Spinners";

(6) Affixing, applying, annexing, or using in connection with the advertisement, promotion, performance, and/or exhibition of any performance or performers under the name "The Spinners," or any similar incarnation of the name, a false description or representation, including words or false symbols tending to describe or represent such goods or services as being those of Plaintiffs;

(7) Diluting and/or infringing Plaintiffs' trade name "The Spinners," and/or damaging Plaintiffs' goodwill, reputation and business;

(6) Effecting assignments or transfers, forming new entities or associations, or utilizing any other means, device or artifice, for the purpose of circumventing or otherwise avoiding the prohibitions set forth in this order of permanent injunction.

PROVIDED HOWEVER, Defendant George Cameron, a/k/a G.C. Cameron, may refer to himself in any marketing scheme for any performances for himself and those who perform with him, if presented as a group, the he and only he, is a former/ ex singer, or former/ ex lead performer with "The Spinners". He shall insure that this qualification is prominently disclosed in all of his promotional materials and those who perform with him, should that be the case.

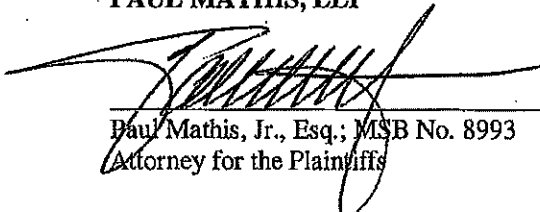
Pursuant to Fed. R. Civ P. 54 (b), the court hereby makes an express determination that there is no just reason for delay, and expressly directs entry of this judgment of permanent injunction forthwith.

IT IS SO ORDERED,

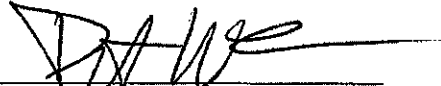
s/David Bramlette
10/30/13

APPROVED AS TO FORM:

PAUL MATHIS, LLP


Paul Mathis, Jr., Esq.; MSB No. 8993
Attorney for the Plaintiffs

LAW OFFICES OF BOBBY MOAK


Robert W. Moak, Esq., MSB No. 9915
Attorney for the Defendants George Cameron, a/k/a G.C. Cameron,
L & G Productions; Linda Dixon, a/k/a Linda Thomas, a/k/a Linda Cameron,
a/ka LADY L.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SPINNERS PERFORMING ARTS, LLC, D/B/A "THE SPINNERS"
AND HENRY L. FAMBROUGH

PLAINTIFFS

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AMJ MANAGEMENT, and AMJ ENTERTAINMENT EVENTS

DEFENDANTS

_____ /

EXHIBIT D

TO

VERIFIED COMPLAINT



August 30, 2018

Don't miss The Spinners, Uvee Hayes and The Dreams of Chicago with a special tribute to the DELLS. Get your tickets early. Tickets for the Spinners Show are now on sale at Metrotix and Harris-Stowe State University and other local outlets. On line sales are available. And Disabled parking and elevators are accessible at Harris - Stowe. Presented by The National Black Radio Hall of Fame and the Don and Heide Wolff Jazz Institute of Harris-Stowe State University..Call today Metrotix (314) 534-1111 or Harris-Stowe (314) 340 3343.

THE SPINNERS Showcase "A SPECIAL TRIBUTE TO THE DELLS"

HARRIS-STOWE STATE UNIVERSITY

OCTOBER 13 | HGA **SHOWTIME 7:00PM**

The Spinners

Uvee Hayes

The Dreams

HARRIS-STOWE STATE UNIVERSITY

Wolff Jazz Institute

TICKETS AVAILABLE @METROTIX 314.534-1111
ALSO @HARRIS-STOWE STATE UNIVERSITY
TICKETS \$30

3026 LACLEDE AVENUE | ST. LOUIS, MO 63103
CALL (314) 340-5773 FOR INFORMATION ABOUT THE PROGRAM OR TICKET INFORMATION.



Bernie Hayes

October 1 at 11:43 AM

THE SPINNERS Showcase "A SPECIAL TRIBUTE TO THE DELLS"

HARRIS-STOWE STATE UNIVERSITY

OCTOBER 13 | HGA SHOWTIME 7:00PM

Uwee Hayes

The Dreams

The Detroit Spinners

The Dells

Tickets Available @Metrotix 314.534-1111
Also @Harris-Stowe State University
TICKETS \$30

3026 LACLEDE AVENUE | ST. LOUIS, MO 63103
CALL (314) 340-5773 FOR INFORMATION ABOUT THE PROGRAM OR TICKET INFORMATION.



Write a comment...



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SPINNERS PERFORMING ARTS, LLC, D/B/A "THE SPINNERS"
AND HENRY L. FAMBROUGH

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DEFENDANTS

_____ /

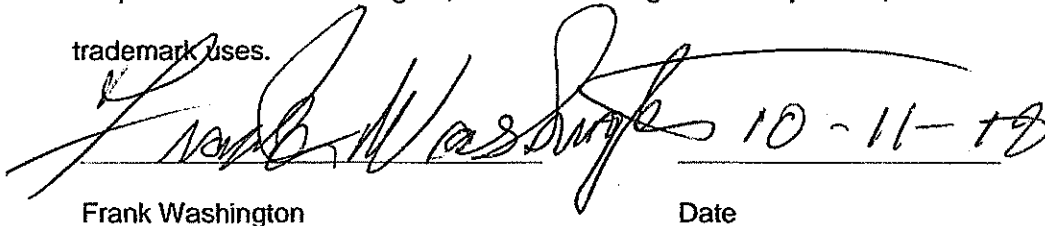
EXHIBIT E

TO

VERIFIED COMPLAINT

ACKNOWLEDGEMENT

The undersigned acknowledges that Spinners Performing Arts, LLC owns US trademark registration No. 1061389 for THE SPINNERS for entertainment services. The undersigned further acknowledges that he does not have rights to use THE SPINNERS as a trademark, unless expressly authorized by The Spinners Performing Arts, LLC. The undersigned represents and warrants that he will not use THE SPINNERS as a trademark except with authorization from The Spinners Performing Arts, LLC and that any such unauthorized use of the name and/or image is subject to enforcement under the applicable laws governing infringement. However, nothing herein shall prevent the undersigned from using the phrase "Frank Washington, former lead singer of the Spinners," or other descriptive non-trademark uses.

 10-11-19

Frank Washington

Date

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SPINNERS PERFORMING ARTS, LLC, D/B/A "THE SPINNERS"
AND HENRY L. FAMBROUGH

PLAINTIFFS

VS

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ANDREA JACKSON, INDIVIDUALLY; AMJ ENTERTAINMENT GROUP,
AMJ MANAGEMENT, and AMJ ENTERTAINMENT EVENTS

DEFENDANTS

_____ /

EXHIBIT F

TO

VERIFIED COMPLAINT

www1.ticketmaster.com



Mother's Day Festival

Event Info



WE Entertainment & Production are doing a concert/festival to raise some funds for Ayden's Army of Angels. At the same time WE are giving an opportunity to the community to raise money for their families. Las Vegas is a musical community so WE are having a host of entertainers to perform for the audience. This will give our vendors a chance to make money for their families. It will give our sponsors a chance for more exposure to the community and perhaps the world. Please come enjoy us in making this event a huge success!

LOCAL PERFORMERS:

- Avana Christie
- You and I Band featuring Rick James and Teena Marie and the Mary Jane Girls

CELEBRITY PERFORMERS:

- Phyllies Intruders featuring Tony Strong
- Stylistics Revue
- Frank Washington Spinners Revue
- Blue Magic
- Force MDS

General Admission

4:35 PM



www1.ticketmaster.com



Mother's Day Festival

Sat • May 04 • 2:00 PM

Mother's Day Festival

The Amp at Craig Ranch

Craig Ranch Park 628 W. Craig Rd, North Las Vegas,
NV

See All Events at The Amp at Craig Ranch

[Get Directions](#) 

Please note: Permitted Items include:

Chair no more than 3" tall

Blanket

Pillow

The following items are NOT ALLOWED:

- No Re-Entry
- No Chairs taller than 3 feet
- No Coolers
- No Canopies or Easy Ups
- No Large Umbrellas
- No Smoking in seating sections
- No Weapons
- No Outside food or beverages (sealed water okay)
- No Video cameras

General Admission



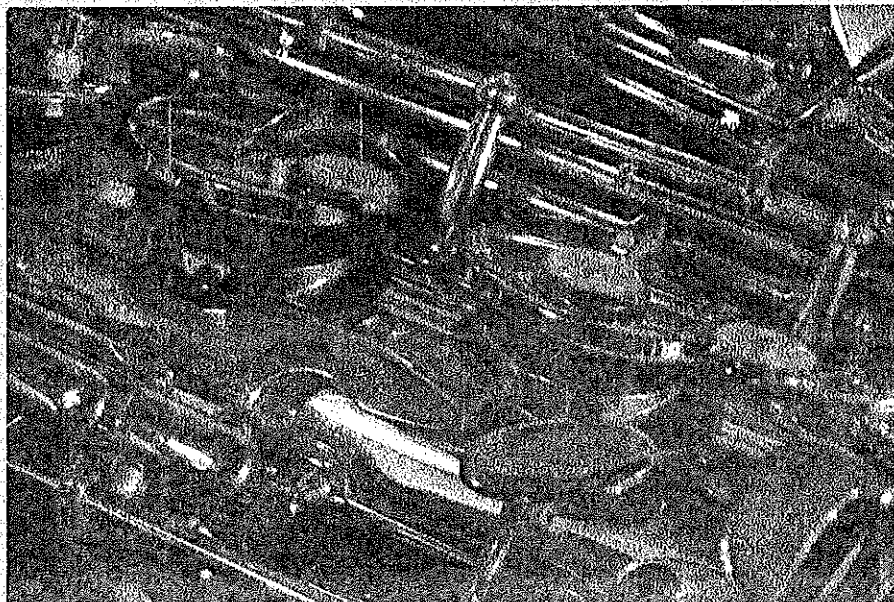
Mother's Day Festival

Saturday 4 May 2019 2:00 PM ▶ Saturday 4 May 2019 11:59 PM

SAVE

North Las Vegas (<https://www.evensi.us/nevada/north-las-vegas/>)

Mother's Day Festival (<https://www.evensi.us/mothers-day-festival-the-amp-at-craig-ranch/285437046>)



(https://s1.ticketm.net/dam/c/48b/2352e3b5-8496-496b-97a3-e605177e848b_105851_RETINA_PORTRAIT_3_2.jpg)

Last update 17/01/2019

11

(https://business.evensi.com/plans/&eventId=285437046&utm_campaign)

FIND TICKETS
ticketmaster.evyy.net

The Amp At Craig Ranch
Craig Ranch Park, North Las Vegas,
89032, NV, United States



PLACES TO STAY

Think StubHub but
WITHOUT fees.



Same tickets. Same seller.
10-15% cheaper at checkout.

TickPick

Shop Now >

WEBSITE: ticketmaster.evyy....973FA1B9A (<http://ticketmaster.evyy.net/c/339603/271177/4272?u=https%3A%2F%2Fwww.ticketmaster.com%2Fmothers-day-festival-north-las-vegas-nevada-05-04-2019%2Fevent%2F1700562973FA1B9A>)

Browse other venues in North Las Vegas
(<https://www.evensi.us/nevada/north-las-vegas/venues?l=en>)

ensi.us/mothers-day-festival-the-amp-at-craig-ranch/285437046)

(https://twitter.com/share?url=https://www.evensi.us/mothers-day-festival-the-amp-at-craig-ranch/285437046&text=Mother's Day Festival @ The Amp at Craig Ranch - 4-May @evensi_app)

(https://plus.google.com/share?url=https://www.evensi.us/mothers-day-festival-the-amp-at-craig-ranch/285437046)

(mailto:?subject=Mother's Day Festival&body=Mother's Day Festival - 04/05/2019 - https://www.evensi.us/mothers-day-festival-the-amp-at-craig-ranch/285437046)

(https://www.pinterest.com/pin/create/button/?url=https%3A%2F%2Fwww.evensi.us%2Fmothers-day-festival-the-amp-at-craig-ranch%2F285437046&media=https%3A%2F%2Fs1.ticketm.net%2Fdam%2F%2F48b%2F2352e3b5-8496-496b-97a3-e605177e848b_105851_RETINA_PORTRAIT_3_2.jpg&description=Mother%27s+Day+Festival+%40+The+Amp+at+Craig+Ranch++4-May+https%3A%2F%2Fwww.evensi.us%2Fmothers-day-festival-the-amp-at-craig-ranch%2F285437046)



WE Entertainment & Production are doing a concert/festival to raise some funds for Ayden's Army of Angels. At the same time WE are giving an opportunity to the community to raise money for their families. Las Vegas is a musical community so WE are having a host of entertainers to perform for the audience. This will give our vendors and musicians a chance to make money for their families. It will give our sponsors a chance for more exposure to the community and perhaps the world. Please come join us in making this event a huge success. VIP seats are \$55 in advance and include backstage passes for the meet and greet for the first 300 people. LOCAL PERFORMERS: - Avana Christie - You and I Band featuring Rick James and Teena Marie and the Mary Jane Girls CELEBRITY PERFORMERS: - Phyllies Intruders featuring Tony Strong - Stylistics Revue - Frank Washington Spinners Revue - Blue Magic - Force MDS

1 | No Fee Tickets Compare our prices to the competition at the checkout screen. (1/1/19)

2 | Download PDF (Free) Download & Share Your Documents. (1/1/19)

Ad

Ad

FESTIVALS

NEARBY HOTELS AND APARTMENTS

The Amp at Craig Ranch

Craig Ranch Park, North Las Vegas, 89032, NV, United States

REPORT THIS EVENT

 songkick.com



Get The Free App

Atlantic City, NJ, US

BUY TICKETS

 INTERESTED

 GOING

UPCOMING FESTIVAL

→ **Saturday 04 May 2019**

Mother's Day Festival 2019

→ The Spinners, The Stylistics, Blue Magic,
Force M.D.'s, and The Legendary Intruders
North Las Vegas, NV, US

BUY TICKETS

 INTERESTED

 GOING

PAST CONCERT

Saturday 07 May 2011

Charlie Wilson, The Whispers, Keith Sweat,
and Mother's Day Music Fest
Boardwalk Hall, Atlantic City, NJ, US



 I WAS THERE